

Mr. Jeff R. Derouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601 RECEIVED

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PUBLIC SERVICE COMMISSION

Louisville Gas & Electric Company Corporate Law 220 W. Main Street Louisville, Ky 40232 www.lge-ku.com

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April 15, 2011

RE:

In the matter of Louisville Gas and Electric Company Alleged Failure to

Comply with KRS 278.042 Case No. 2011-00098

Dear Mr. Derouen:

Enclosed please find and accept for filing the original and twelve (10) copies of Louisville Gas and Electric Company's Response to the Commission's Order of March 29, 2011 and Motion to Suspend Hearing and Schedule Informal Conference in the above-referenced matter. Please confirm your receipt of same by placing the stamp of your Office with the date received on the two additional copies provided and return them to me in the self-addressed stamped envelope I have provided.

Should you require anything further, please contact me at your convenience.

Sincerely,

Allyson K. Sturgeon

AKS/kcg

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

LOUISVILLE GAS AND ELECTRIC COMPANY	) ) ) CASE NO. 2011- )
ALLEGED FAILURE TO COMPLY WITH KRS 278.042	)

In the Matter of:

## RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY TO THE COMMISSION'S ORDER OF MARCH 29, 2011 AND MOTION TO SUSPEND HEARING AND SCHEDULE INFORMAL CONFERENCE

On March 29, 2011, the Kentucky Public Service Commission ("Commission") issued an Order directing Louisville Gas and Electric Company ("LG&E") to file a written response to the allegations contained in the Electric Utility Personal Injury Incident Report ("Report") prepared by the Commission Staff dated September 9, 2010. For its Response to the Commission's Order, LG&E states as follows:

- 1) LG&E admits the information contained in the sections of the Report titled "Utility," "Reported By," "Incident Occurred," "Utility Notified," "PSC Notified," "PSC Investigated," "Report Received," and "Incident Location" are accurate.
- 2) LG&E admits the information contained in the section of the Report titled "Incident Description" is accurate.
- 3) LG&E admits, based on information and belief, that the information contained in the sections of that Report titled "Victim," "Persons on Site," "Information From" and "Notes" are accurate.

4) With regard to the section of the Report titled "Probable Violations" LG&E denies that it committed any willful violation of KRS 278.042 or the National Electric Safety Code.

5) LG&E admits the information contained in the section of the Report titled "Temp & Weather."

**NOW THEREFORE,** LG&E requests that this case be dismissed or, in the alternative, that the hearing date set for August 30, 2011 be suspended and that an informal conference be scheduled with the Commission Staff for the purposes of discussing settlement and expediting resolution of this proceeding. LG&E's willingness to discuss settlement is not, and should not be construed as, an admission of liability or fault on its part.

Dated: April 15, 2011

Respectfully Submitted,

Allyson K. Sturgeon

Senior Corporate Attorney

Louisville Gas and Electric Company

220 West Main Street Louisville, KY 40202

(502) 627-2088

Counsel for Louisville Gas and Electric

Company

## **CERTIFICATE OF SERVICE**

I hereby certify a true and accurate copy of the foregoing was sent via U.S. First Class mail to the below person on the 15<sup>th</sup> day of April, 2011.

Rick Bertleson Staff Counsel Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

ALLYSON K. STURGEON